

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CHASIDY PLUNKARD :
Plaintiff : No. 1:18-CV-1536
v. : JURY TRIAL DEMANDED
CHARLES H. MARKS, D.O. : Assigned to: Christopher C.
DUANE E. SIPES, M.D., : Conner, Chief Judge
CAYLA RABER, CRNP, :
WELLSPAN OB/GYN; and :
GREENCASTLE FAMILY :
PRACTICE :
Defendants :

PRAECIPE TO FILE STIPULATION

TO THE PROTHONOTARY:

Kindly file of record the attached Stipulation of Counsel.

Respectfully submitted,

CIPRIANI & WERNER, P.C.

Date: October 15, 2018

/s/ Cindy N. Ellis

Leigh A.J. Ellis, Esquire

PA Attorney I.D. No. 53229

Cindy N. Ellis, Esquire

PA Attorney I.D. No. 83823

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**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

CHASIDY PLUNKARD	:	
	:	No. 1:18-CV-1536
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Plaintiff	:	
	:	JURY TRIAL DEMANDED
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v.	:	
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CHARLES H. MARKS, D.O.	:	Assigned to: Christopher C.
DUANE E. SIPES, M.D.,	:	Conner, Chief Judge
CAYLA RABER, CRNP,	:	
WELLSPAN OB/GYN; and	:	
GREENCASTLE FAMILY	:	
PRACTICE	:	
	:	
Defendants	:	

STIPULATION OF COUNSEL

AND NOW come Plaintiff, by and through her counsel, Kline & Specter, P.C., and Duane E. Sipes, M.D., Cayla Raber, CRNP and Greencastle Family Practice, by and through their counsel, Cipriani & Werner, P.C. and hereby stipulate and agree to the following:

1. The within medical professional liability action was initiated by Complaint filed on August 2, 2018.
 2. Count V of the Complaint alleged Corporate Negligence as to Greencastle Family Practice.
 3. Plaintiff hereby agrees to the dismissal of Count V – Corporate Negligence from the case with prejudice.

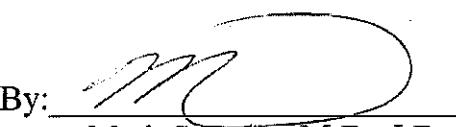
4. The stipulation may be executed in counterparts and shall be considered effective and signed by all counsel even those signed on separate signature pages.

5. Counsel certify that they are authorized to execute the stipulation on behalf of their respective clients and that they authorize the filing of non-original facsimile or other copy of the present stipulation.

6. The parties, by their respective counsel, have caused the stipulation to be executed and intend to be legally bound thereby.

Kline & Specter, P.C.
The 19th Floor
1525 Locust Street
Philadelphia, PA 19102

Date: 10/9/18

By: 
Mark S. Polin, M.D., J.D.
(Counsel for Plaintiffs)

Cipriani & Werner, P.C.
1011 Mumma Road, Suite 201
Lemoyne, PA 17043

Date: 10/15/2018

By: 
Cindy N. Ellis, Esquire
(Counsel for Duane E. Sipes,
M.D., Cayla Raber, CRNP and
Greencastle Family Practice)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing were served upon all counsel of record this 15th day of October 2018, by depositing said copy in the United States Mail, postage prepaid, first class delivery, and addressed as follows:

Shanin Specter, Esquire
Kline & Specter, P.C.
The Nineteenth Floor
1525 Locust Street
Philadelphia, PA 19102
Counsel for Plaintiff

Collin Keyser, Esquire
Stephen J. Fleury, Jr., Esquire
Saxton & Stump, LLC - Lancaster
280 Granite Run Drive
Suite 300
Lancaster, PA 17601
Counsel for Charles H. Marks, DO and Wellspan OB/GYN

CIPRIANI & WERNER, P.C.

By: Melody S. Ridge
Melody S. Ridge, Legal Assistant